



### **EB Unit**

3. Unit “EB” is on the main campus. Currently, there are 11 women in EB, 5 of whom are ICE detainees, while the remaining are state pre-trial detainees. There are a total of 16 cells in EB. They are 80 square feet in size (8’ x 10’). 8 cells are located on the ground level and another 8 are on the mezzanine level. Each of the 16 cells has a single double bunk bed. All four female ICE detainees in the EB Unit are housed in a cell without a roommate. In fact, all detainees and inmates in EB are in a cell by themselves. Also, in EB, there is a common bathroom on both levels, each has 2 toilets and 2 sinks. The bathroom on the ground level, which is 7’ x 9’, has a single shower, while the mezzanine level has 2 showers. There is a Common Area, which is 33’ x 20’, in EB which contains an Officer’s Control Desk, a separate Education//Program Room, measuring 10’ x 12’, with 1 large table and 16 chairs, as well as 2 small tables with 4 chairs each. The Common Area is used for dining, playing cards, watching TV, and writing letters. Lastly, there is an outside recreation area located off the Common Area which is approximately 1500 square feet in size.. The Common Area, Recreation Area, Main Area, and Education/Program Room are all sufficiently sized to allow the detainees (and the inmates) to practice social distancing.

### **2 East Unit**

4. Presently, there are 36 male ICE detainees who are housed in “2 East.” 2 East is on the main campus of BCHOC. High risk male ICE detainees are housed there with state pre-trial detainees. This unit is part of our Mods unit and has a capacity for 104 persons. The current population is 54 (36 ICE detainees and 18 state pre-trial

inmates). These current 36 ICE detainees are divided into 8 cells, each of which measures 330 square feet (30' x 11'). There are a total of 13 cells at 2 East. Each cell has a capacity for 8 detainees. Because of the size of the 2 East population, no cell is at full capacity. Seven (7) cells are located on the north side of the room, which is divided by a hall, and the other 6 are on the opposite side of the room (south).

5. With regard to ICE detainees in 2 East, by order: Cell 241 has 5 detainees; Cell 242 has 5 detainees; Cell 244 has 4 detainees; Cell 246 has 4 detainees; Cell 248 has 5 detainees; Cell 250 has 4 detainees; Cell 252 has 5 detainees; and, Cell 254 has 4 detainees. The other 5 cells are occupied by state pre-trial inmates. Each cell contains 4 double bunk beds in total, 3 on one wall (each bunk bed unit is separated by approximately 7'-34" between the foot end of one bunk and the head end of the next bunk, which means that detainees' heads are at least 6-8 feet apart linearly). There is one more double bunk bed situated 6'-7' across the cell on the other wall, with approximately 8' separating center of each bunk bed (where the occupant's head is) from the center of the bed on the opposite wall. No portion of an occupant in a bed on one wall is closer than 6' to any portion of the occupant of a bed on the opposite wall. For all of the bunks, the bottom bunk bed is approximately 3' below the upper bunk bed, but it should be kept in mind that there is a solid barrier between the upper and lower bunks upon which the upper mattress sits. With the current population in 2 East, there is enough space so each of the three bunkbeds on one wall have only a single occupant. We have arranged it to that the adjacent bunks alternate as to which level, top or bottom, is occupied to increase the distance between detainees' heads. If

- the cell has five detainees, both the bottom and top level of the bunk on the opposite side are occupied, but with the head of one detainee over the feet of the other detainee. No detainee's head is closer to another detainee's head than 6.7 feet.
6. Lastly, there is a hallway in the 2 East facility that measures 30' x 7'. This is sufficiently large to allow detainees and inmates to practice appropriate social distancing.
  7. There are 2 bathroom/shower rooms in 2 East. The bathrooms are 21' x 9' in size. One is located on the North side, while the other is on the South side. The North side bathroom/shower room has 3 toilets, 5 showers, 6 sinks, and 2 urinals. The South side bathroom/shower room has 4 toilets, 5 showers, 7 sinks, and 1 urinal. The bathroom/shower areas have sufficient space for the current population to practice appropriate social distancing.
  8. Unit 2 East has one large Common Area 59' x 30', which contains an Officer's Control Desk, which has 6 long tables with 8 chairs for each, 2 medium size tables with 4 chairs per table, and 5 round tables with 4 chairs. These tables are spaced between 5'-6' apart. The Main Area is used for dining and dayroom used for playing cards, watching TV, playing games, and writing letters. There is an outside recreational area the size of a football field (160'x 280') which has a walking path, a grass area for activities, and asphalt area with a basketball court. All of these areas have sufficient space for the current population to practice appropriate social distancing.
  9. With the present configuration of the cells and placement of the bunk beds, there is more than adequate space for 6' social distancing recommended by the Centers for

Disease Control (“CDC”).

**C. Carlos Carreiro Immigration Detention Center**

10. The last facility housing ICE detainees is the C. Carlos Carreiro Immigration Detention Center (the “Center”). This facility is divided into Unit A and Unit B. These are separate and distinct units, with separate housing, dining and recreational areas.

**Unit A**

11. In Unit A, there are currently 19 ICE detainees, even though there is capacity for 66 detainees. However, I am informed that 1 detainee will be removed from Unit A next week so he can be removed from the United States. Unit A is dormitory style, containing no cells. Unit A has 66 beds (33 double bunk beds) which are placed in 5 rows in an area approximately 1624 square feet (28’ x 58’). 3 rows have 7 bunk beds per row (4’ separating each row of bunk beds from the next row, with 3’ between the end of one bunk bed and the next bunk bed in the same row). The other 2 rows have 6 bunk beds per row, with the same 3’ separation between beds. As of April 6, 2020, the BCHOC has assigned detainees so that only every other row is occupied. To separate the detainees in their sleeping quarters, Row 1 is occupied by 6 detainees, Row 2 has no detainees, Row 3 has 4 detainees, while Row 4 is empty, and Row 5 is occupied by 9 detainees. This provides significant space between the rows (approximately 12’ feet) occupied with detainees because of the empty row in the middle, and even more space between detainees because not all beds in a row are filled.
12. Beyond the last row of beds, there is a Common Area about 13’ away. The Common

Area approximates 3100 square feet comprised of 8 round tables, each 8 feet in diameter, with 8 chairs for each. These tables are used for dining, playing games and watching TV. Also, there is a separate Laundry Room which measures 9' x 10', with two washers and 2 dryers in the room. There is a separate Visitors Room measuring 13' x 10', as well as a very large Bathroom/Shower room measuring 19' x 35'.

Within the bathroom, there are 8 sinks, 6 showers, 3 urinals and 6 toilets. Unit A has a separate Classroom that is 18' x 19' in size, where detainees can read and study. Finally, it has an outdoor recreational area that is 30' x 54' where detainees typically play pick up soccer. Each of these areas is sufficiently sized that the current detainee population can practice appropriate social distancing if they wish to do so. The laundry room cannot handle more than two detainees using it at a time, but this is not an impediment to social distancing because of the function for that room. In sum, the Common Area that holds the bunk beds and tables measures 108' x 48' in size.

13. Lastly, Unit A has a separate dedicated medical office measuring 14' x 12'. This room is staffed by a nurse who dispenses medication to the detainees as prescribed and attends to detainee medical calls as needed. Detainees visit the office one at a time when summoned. Should a detainee require greater care, he is transported to the main campus to the larger medical unit.

#### **Unit B**

14. Unit B in the Carreiro Correia Center mirrors Unit A in layout and dimensions; it too is dormitory style. The sleeping area in B is also 1624 square feet (28' x 58'). Briefly, it has 5 rows of bunk beds, with 3 rows containing 7 bunk beds, while 2 rows have 6 bunk beds. In this regard, Row 1 is occupied by 13 detainees, Row 2 is empty,

Row 3 has 8 detainees, Row 4 is empty and Row 5 has 9 detainees. Like Unit A, there also is a Common Area (3100 square feet approximately) comprised of 8 round tables with 8 chairs for each, all situated in the same special area as Unit A's Common Area. These tables are used for playing games, programs, watching TV and for dining. The remaining rooms in Unit B are the same as Unit A and are nearly identical in dimensions; thus, this declaration will not belabor this Court with a repetition of those facts.

15. All detainees have access to the bathroom and shower facility; however, they are encouraged to limit the number of occupants in the area for social distancing purposes. All signs have been posted in three languages. There are also signs throughout Units A, Unit B, EB and 2 East instructing ICE detainees to continually practice social distancing as recommended by the CDC.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS FOURTEENTH DAY OF APRIL, 2020.

/s/ Steven Souza  
STEVEN SOUZA,  
Superintendent,  
Bristol County House of Corrections

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